



ATTORNEYS AT LAW

Michael P. O'Mullan

Partner

Direct:

t: 973.451.8477

f: 973.451.8702

momullan@riker.com

Reply to: Morristown

August 30, 2012

Via ECF & Regular Mail

Hon. William J. Martini, U.S.D.J.
Martin Luther King, Jr. Federal Building & U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07101

Re: McLennan, et al. v. LG Electronics USA, Inc. (Case No. 10-cv-3604-WJM-MF)

Dear Judge Martini:

This law firm represents defendant, LG Electronics USA, Inc., in the above-referenced matter. I am writing with respect to the letter from Sandra Deets, dated August 6, 2012, and filed via ECF on August 13, 2012 as a "Notice of Objection." Ms. Deets' letter is not an objection to the settlement, which was approved by this Court on March 2, 2012. Instead, Ms. Deets' correspondence is a response to a deficiency letter dated July 12, 2012 issued by the Court-appointed Claims Administrator, Rust Consulting, Inc. ("Claims Administrator"), which denied Ms. Deets' claim for reimbursement for an alleged Qualifying Repair in the amount of \$79.50.

Pursuant to the Settlement Agreement, the Claims Administrator is responsible for reviewing all claims for reimbursement of expenses for "Qualifying Repairs" and determining the eligibility of such claims. (See Settlement Agreement § 6.) If a claim is rejected or found deficient, the claimant has thirty (30) days from the mailing of the notice of rejection to submit a "notice and statement of reasons indicating the [claimant's] grounds for contesting the rejection." (*Id.* at § 6(d)) The Claims Administrator then must review the notice and statement of reasons and render a final eligibility determination. (*Id.*)

I have conferred with Class Counsel about this matter. Counsel for both parties agree that further review by the Claims Administrator is the proper course of action under the terms of the Settlement Agreement.

Headquarters Plaza, One Speedwell Avenue, Morristown, NJ 07962-1981 • t: 973.538.0800 f: 973.538.1984

50 West State Street, Suite 1010, Trenton, NJ 08608-1220 • t: 609.396.2121 f: 609.396.4578

500 Fifth Avenue, New York, NY 10110 • t: 212.302.6574 f: 212.302.6628

London Affiliate: 33 Cornhill, London EC3V 3ND, England • t: +44 (0) 20.7877.3270 f: +44 (0) 20.7877.3271

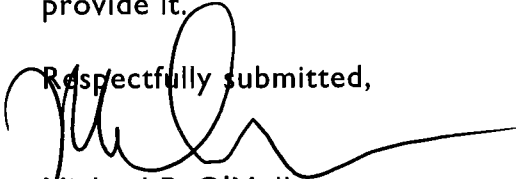
www.riker.com

Hon. William J. Martini, U.S.D.J.
August 30, 2012
Page 2

Thus, I have forwarded Ms. Deets' letter to the Claims Administrator for further review. The Claims Administrator will treat Ms. Deets' letter as her "notice and statement of reasons" in response to the rejection/deficiency of her claim, and will render a final eligibility determination in accordance with the Settlement Agreement.

If Your Honor would like further information about Ms. Deets' claim, counsel would be happy to provide it.

Respectfully submitted,



Michael P. O'Mullan

cc: Sandra K. Deets
Kristen Law Sagafi, Esq.
James Cecchi, Esq.
Paul Kiesel, Esq.